

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MUNICIPALITY OF BAYAMON, et al.,

Plaintiffs,

v.

EXXON MOBIL CORP., et al.,

Defendants.

Case No. 3:22-cv-01550-SCC

**JOINT MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

TO THE HONORABLE COURT:

COME NOW the Plaintiffs and the undersigned Defendants (collectively, the “Parties”), through their respective undersigned counsel, and hereby move this Court pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule 6 for an Order extending the time for Defendants to file their motions to dismiss through October 13, 2023, and extending the time for Plaintiffs to file their oppositions to such motions.¹ In support of this motion, the Parties state and pray as follows:

1. The Complaint was filed in this Court on November 22, 2022. ECF Doc. No. 1.
2. On March 29, 2023, the Parties filed a Joint Motion for Extension of Time to Answer or Otherwise Respond to the Complaint and to Establish Briefing Schedule and Other Procedural Terms Concerning Motions to Dismiss (the “Joint Motion”). ECF Doc. No. 25. The

¹ This motion does not operate as an admission of any factual allegation or legal conclusion and is submitted subject to and without waiver of any right, defense, affirmative defense, claim, or objection, including lack of subject matter jurisdiction, lack of personal jurisdiction, or insufficient service of process.

Joint Motion contained the Parties' stipulations concerning a briefing schedule, page limitations and other procedural stipulations related to the forthcoming motions to dismiss, including, in pertinent part, that Defendants' Motions to Dismiss for Lack of Personal Jurisdiction under Rule 12(b)(2), Motions to Dismiss For Failure to State a Claim under Rule 12(b)(6), and any Motion(s) to Strike and/or Dismiss under any relevant "anti-SLAPP" laws (collectively, "the Motions to Dismiss") shall be due by July 21, 2023.

3. By Order entered on March 30, 2023, the Court granted the Joint Motion. ECF Doc. No. 31.

4. Thereafter, the Court granted the Parties' further Joint Motion extending the time to file the Motions to Dismiss through September 1, 2023. ECF Doc. No. 60.

5. As a result of upcoming conflicts faced by counsel for Plaintiffs, including several upcoming trials in other matters, Plaintiffs requested and Defendants have agreed to further extend the deadline to file the Motions to Dismiss by six weeks (*i.e.*, through October 13, 2023), with the other procedural stipulations in the Joint Motion and allowed by the Court to remain unaltered. Because the Joint Motion provided that "Plaintiffs' Oppositions to the Motions to Dismiss shall be due 90 days after the Motions to Dismiss are filed," ECF Doc. No. 25, ¶ 3.b, this extension would also extend the time for Plaintiffs to file their Oppositions by six weeks. (It also would extend the time to file Defendants' Replies by the same period.)

6. Accordingly, the Parties respectfully request that this Honorable Court enter an Order extending the time for Defendants to file the Motions to Dismiss through October 13, 2023.

7. The Parties agree to abide by the terms of this Joint Motion pending the Court's issuance of an Order on the same, which the Parties acknowledge may not occur before September 1, in light of the Court's calendar and caseload.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an Order extending the time for Defendants to file the Motions to Dismiss through October 13, 2023.

Respectfully submitted, this 29th day of August, 2023.

I, Roberto C. Quiñones-Rivera, certify that, on the above date, I filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record registered in the system.

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